

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

Claudia Balcerro Giraldo, *et al.*,

Plaintiffs,

v.

Drummond Company, Inc., *et al.*,

Defendants.

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Case No. 2:09-cv-1041-RDP

DEFENDANTS' MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL

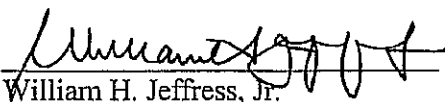
COME NOW, Defendants Drummond Company, Inc., Drummond Ltd. and Augusto Jimenez, and hereby move this Court for leave to file under seal Exhibits B, C and D to Defendants' Motion for Relief Under Paragraphs 6 and 7 of Stipulated Protective Order. These exhibits include a declaration by former paramilitary Jhon Jairo Esquivel Cuadrado that is currently marked "confidential," as well as communications between counsel referring to this declaration. The Motion is herewith filed in paper form and in PDF form on the disk provided with this Motion.

WHEREFORE, PREMISES CONSIDERED, Defendants respectfully request that the Court GRANT their Motion for Leave To File Exhibits Under Seal.

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Dated: August 29, 2011

Respectfully submitted,



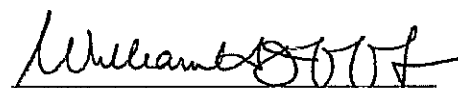
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Defendants' Motion for Leave to File Exhibits Under Seal was sent by e-mail and U.S. mail, first class postage prepaid, this 29th day of August, 2011, to Terrence Collingsworth, Conrad & Scherer, 1156 15th St NW, Suite 502, Washington, DC 20005, counsel for plaintiffs.


William H. Jeffress, Jr.